

REMARKS

This paper is filed in response to the office action mailed on March 18, 2005.

In the office action, the claims are rejected under 35 U.S.C. § 112, second paragraph for using the abbreviations LVT, ODT, ESD and CDM in claims 3-4, 6-8 and 11-12. In response, the claims have been amended to traverse this rejection by reciting low threshold voltage (LVT) as defined in paragraph 0024; on-die termination (ODT) as recited in paragraph 0002; electrostatic discharge protection (ESD) as recited in paragraph 0030; and charged device mode (CDM) as recited in paragraph 0030. In view of the amendments to the specification and claims, applicants respectfully submit that all pending claims are now in full compliance with 35 U.S.C. § 112.

Next, the office action rejects claim 1 under 35 U.S.C. § 102(b) as allegedly being anticipated by U.S. Patent No. 5,535,163 ("Matsui"). In response, claim 1 has been amended to recite that the DQ switch is electrically connected between the output driver and the DQ pad and further that the DQ switch electrically isolates the output driver from the DQ pad in the writing mode and electrically connects the output drive to the DQ pad in the reading mode. Applicants respectfully submit that Matsui does not teach or suggest these features and therefore cannot serve as an anticipating reference under MPEP § 2131 or as a base reference for an obviousness rejection under MPEP § 2142.

Specifically, the Patent Office alleges that, in Figure 5 of Matsui, Matsui discloses a DQ switch TG21 which electrically isolates the output driver 22 from the DQ pad IO1 in the writing mode. However, the alleged switch TG21 is a transfer gate (column 7, line 15) and is disposed between the buffer 22 (column 7, line 48) and the output buffer DOUT1 (column 8, line 51). Thus, the switch TG21 of Matsui is electrically connected between two buffers 22 and DOUT1, not between an output driver and a DQ pad as recited in claim 1. Further, the switch TG21 of Matsui does not electrically isolate an output drive from a DQ pad in a writing mode as recited in claim 1 and it does not electrically connect an output driver to a DQ pad in a reading mode as recited in claim 1. A more relevant figure from Matsui is Figure 2 which discloses a write selector 13 disposed between two buffers 11, 12 and between two input buffers DIN2 and DIN1. However, the write selector 13 of Matsui does not isolate an output driver from a DQ pad in a writing mode or connect an output driver to DQ pad in a reading mode as recited in amended claim 1.

Therefore, Matsui clearly fails to teach or suggest every element of amended claim 1 and cannot serve as an anticipating reference under § 2131. Further, Matsui fails to teach or suggest every element of amended claim 1 and therefore cannot serve as an obviating reference under § 2142. Because the configuration of Matsui is so different from amended claim 1, applicants respectfully submit that Matsui cannot be combined with other references or record to establish an adequate *prima facie* case of obviousness as required by § 2142. Therefore, applicants respectfully submit that claims 1-12, as presently amended, are allowable over Matsui.

With respect to new claim 14, applicants respectfully submit that this claim and dependent claims 15-20 are all allowable over Matsui as Matsui does not teach or suggest the DQ switch recited in new claim 14 which includes similar limitations as recited in claim 1. Specifically, Matsui does not teach or suggest a DQ switch electrically isolating an output driver from a pad in writing mode and electrically connecting the output driver to the pad in a reading mode. Matsui also does not teach or suggest a DQ switch connected between an output driver and a pad. Accordingly, because independent claim 14 is allowable over Matsui, dependent claims 15-20 are allowable as well.

An early action indicating the allowability of claims 1-12 and 14-20 is earnestly solicited.

The Commissioner is authorized to charge any fee deficiency required by this paper, or credit any overpayment, to Deposit Account No. 13-2855.

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Respectfully submitted,

By 

Michael R. Hull

Registration No.: 35,902

MARSHALL, GERSTEIN & BORUN LLP

233 S. Wacker Drive, Suite 6300

Sears Tower

Chicago, Illinois 60606-6357

(312) 474-6300

Attorney for Applicant